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February 3, 2000

Mary L Cottrell, Secretary

Department of Telecommunications and Energy

One South Station

Boston MA 02110

Re: Bell Atlantic's Proposed Pooling Costs.

#### COMMENTS OF NEXTLINK MASSACHUSETTS, INC.

NEXTLINK Massachusetts, Inc. ("NEXTLINK"), pursuant to the above-captioned matter, hereby submits its comments. NEXTLINK strenuously objects to Bell Atlantic's ("BA") estimates of its costs to implement manual number pooling at almost \$8 million dollars. Additionally, NEXTLINK does not agree that the implementation of embedded contaminated block assignments ("Phase 3") be postponed until after February 1, 2001.

#### BELL ATLANTICS ESTIMATED COST FOR NUMBER POOLING

Even considering the "proprietary" information distributed at the January 24th Technical Session ("Technical Session"), BA has not provided enough detail and/or justification for the outrageous estimate of \$8 million to implement number pooling. During the Technical Session errors were discovered with BA's estimates. These errors must be corrected and a more in-depth justification must be submitted. The Department must go beyond a cursory review of BA's estimates and verify all of BA's claims.

#### NUMBER POOLING IMPLEMENTATION

NEXTLINK, however, would like to stress that closer examination of BA's estimated costs should not slow down current efforts to expeditiously implement number pooling in Massachusetts. As NEXTLINK has frequently indicated to the Department, swift steps need to be taken to ensure competition is not stifled because of a lack of numbers. There are currently numerous rate centers that NEXTLINK would like to offer its services in, but cannot solely on the basis of a lack of numbers. That is why NEXTLINK is in favor of implementing number conservation methods as soon as possible.

NEXTLINK does not see any reason to delay implementation of Phase 3. BA's recommendation to delay implementation of embedded contaminated blocks until after February 1, 2001 is unjustified by BA. The mere claim that the "contaminated block donation steps can be performed in a mechanized fashion" to minimize any impact to a BA consumer is without support and in no way should prevail over the fact that CLECs, such as NEXTLINK, have zero numbers in numerous rate centers. It is not a surprise that BA would like to delay any effort by the Department that would result in CLECs obtaining numbers in rate centers that would enable them to compete against BA. BA readily admits that it has extra phone numbers in every rate center in Massachusetts. BA is not turning customers away because of a lack of numbers. Unfortunately, as already stated, NEXTLINK cannot even attempt to compete against BA in numerous rate centers due to a lack of numbers. For this reason alone the

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Department should view any postponement or delay offered by BA as a self interested attempt to limit competition and ensure that it remains the sole provider of services in many rate centers solely due to the extreme numbers shortage in Massachusetts. BA is quite adept at offering superficial reasons for delay, often citing high cost or lack of personnel. NEXTLINK respectfully requests that the Department go beyond BA's mere assertions and expeditiously implement all three (3) phases of number pooling as expeditiously as possible.

#### CONCLUSION

NEXTLINK respectfully request that the Department fully examine BA's cost estimates and proceed to implement number conservation measures as expeditiously as possible, keeping in mind that Massachusetts consumers are currently denied their choice of service providers because of a lack of numbers. The inability to obtain readily available numbers in Massachusetts is an extremely important issue which requires swift action on the part of the Department. Therefore, NEXTLINK respectfully requests that the DTE deny BA's recommendation that Phases 3 be postponed until after February 1, 2001.

Respectfully submitted,

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Michael D'Angelo

Director, Regulatory Affairs